

# DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS DEGEN TO INTERROGATORIES OF  
THE DIRECT MARKETING ASSOCIATION, INC.  
(DMA/USPS-T12-25-26)

The United States Postal Service hereby provides responses of witness Degen to the following interrogatories of the Direct Marketing Association, Inc.: DMA/USPS-T12-25-26, filed on November 14, 1997. Objections to interrogatories DMA/USPS-T12-27-29 were separately filed today.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
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November 21, 1997

**Response of United States Postal Service Witness Degen  
to Interrogatories of the Direct Marketing Association, Inc.**

**DMA/USPS-T12-25. Please refer to your supplemental testimony (USPS-ST-47), Exhibit USPS-47A, page 7, concerning data collection procedures.**

- a. Please confirm that some IOCS readings are taken by phone. If not confirmed, please explain fully.**
- b. Please provide the percentage of IOCS readings that are taken by phone.**
- c. Has the Postal Service performed any statistical analysis to test whether the subclass distribution of readings taken by phone is statistically different from the subclass distribution of readings taken in person? If so, please summarize and provide a copy of findings.**
- d. Has the Postal Service performed any statistical analysis to test whether any other characteristics of readings taken by phone are statistically different from those for readings taken in person? If so, please summarize and provide a copy of findings.**
- e. Is there a field on the IOCS tally data set which indicates whether the tally was taken by phone? If so, please identify the field.**
- f. Please describe the skills and training of the personnel actually observing the sampled employee when the data collector is taking the IOCS readings by phone.**
- g. Please describe the process by which the person actually observing the sampled employee records the tally information (including identification of the subclass and shape of mail) when the data collector is taking the IOCS readings by phone.**

**DMA/USPS-T12-25 Response.**

- a. Confirmed.**
- b. In FY 1996, 48.6% of IOCS readings (unweighted tallies) were taken by telephone.**
- c. My understanding is that some analyses of phone tally characteristics were initiated in the past. Efforts to locate material related to those analyses were not successful.**
- d. See my response to part c.**

**Response of United States Postal Service Witness Degen  
to Interrogatories of the Direct Marketing Association, Inc.**

- e. Yes. Field F32 indicates the sample method. Please see the hardcopy documentation to LR-H-23 for the values this field can take. Note that the guidelines for telephone readings (see LR-H-49 at page 23) indicate that the sample method is not generally chosen at random. Therefore, if one were to attempt to compare characteristics between sets of tallies with different sample methods, the effects of potentially confounding factors must be taken into account.**
- f. The skills and training of the personnel observing the sampled employee may vary. Data collectors are instructed to verify that the respondent is familiar with IOCS and has supporting items at hand (the Handbook F-45, the automation compatability template, and a scale). See LR-H-49 at page 24.**
- g. The general procedure is to relay IOCS questions over the telephone, following the flow of the CODES IOCS software. See LR-H-49, pages 23-25, for instructions on administering IOCS readings by telephone.**

Response of United States Postal Service Witness Degen  
to Interrogatories of the Direct Marketing Association, Inc.

**DMA/USPS-T12-26. Please refer to your supplemental testimony (USPS-ST-47), Exhibit USPS-47A, page 6, table 5.**

- a. Please confirm that 360,212 of 825,664 IOCS unweighted tallies were assigned the code BF4.
- b. Please list all possible reasons why a tally could be assigned the code BF4.
- c. Please disaggregate BF4 unweighted tally counts by craft and reason listed in subpart b. If you are unable to disaggregate BF4 tallies according to all reasons listed in subpart b, please disaggregate to the extent possible.

**DMA/USPS-T12-26 Response.**

- a. Confirmed.
- b. The reasons for assigning basic function 4 (i.e., BF4) to a tally are summarized in the title of Table 5. That is, the basic function 4 code accounts for readings attempted on employees who are on paid leave, nonscheduled, at lunch, CAG K clerks acting as postmasters, etc., at the reading time. For a complete set of criteria which lead to assignment of basic function 4, please see the source code to program ALB040C9, LR-H-21; the variable of interest is 4-FOSDIC-BASIC-FUNCTION.
- c. Please see Attachment 1 to this response. Most of these tallies are the result of the employee not working in the facility at the time of the reading (please see LR-H-49, page 28). For such tallies, the employee's status is recorded in field F35, the values of which I used to disaggregate the basic function 4 tally counts. Please see the hardcopy documentation to LR-H-23 for a description of this field.

Attachment 1, Response to DMA/USPS-T12-26  
 "Basic Function 4" Tallies by Field F35 Values and Craft

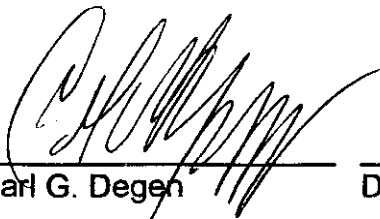
Craft	Field F35 Values								
	A	B	C	D	E	F	G	H	I
Supervisor /1	3,242	1,183	1,197	15	40	44	55	1,275	9,282
Clerk /2	23,775	12,702	1,000	92	1,117	312	337	8,294	82,167
Mailhandler /3	5,777	3,282	112	24	391	114	76	1,948	21,559
Carrier /4	17,822	8,667	598	96	401	494	290	7,874	50,856
Sp. Delv. Msgr. /5	176	78	2	0	4	2	3	44	498
Other	2	0	1	0	0	0	0	2	12
Grand Total	50,794	25,912	2,910	227	1,953	966	761	19,437	164,374

Craft	Field F35 Values							Grand Total
	J	K	L	M	N	Z	Blank	
Supervisor /1	1,768	136	263	411	5	1,449	2,740	23,105
Clerk /2	19,537	10,467	737	10,084	385	10,386	280	181,672
Mailhandler /3	4,778	3,178	183	2,986	2	3,356	11	47,777
Carrier /4	4,144	3,380	508	4,928	52	5,851	82	106,043
Sp. Delv. Msgr. /5	45	37	2	58	0	68	0	1,017
Other	3	1	0	0	0	0	577	598
Grand Total	30,275	17,199	1,693	18,467	444	21,110	3,690	360,212

Notes

- 1/ Roster designations (field F257) 9, 19
- 2/ Roster designations 11, 31, 41, 61, 81
- 3/ Roster designations 12, 32, 42, 62, 82
- 4/ Roster designations 13, 33, 43, 63, 83
- 5/ Roster designations 14, 34, 44, 64, 84

I, Carl G. Degen, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

  
\_\_\_\_\_  
Carl G. Degen      11-21-97  
Date

# **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
\_\_\_\_\_  
Eric P. Koetting

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November 21, 1997